

Charles H. McCrea (SBN #104)
HEJMANOWSKI & McCREA LLC
520 South Fourth Street, Suite 320
Las Vegas, NV 89101
T 702.834.8777 | F 702.834.5262
chm@hmlawlv.com

*Attorneys for Plaintiff/Counter-Defendant
BOCA PARK MARKETPLACE SYNDICATIONS
GROUP, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BOCA PARK MARKETPLACE
SYNDICATIONS GROUP, LLC, a
Delaware limited liability company,

Plaintiff/Counter-Defendant,

vs.

ROSS DRESS FOR LESS, INC.; and
DOES 1 through 20, inclusive,

Defendant/Counterclaimant,

AND ALL RELATED ACTIONS.

Case No. 2:16-cv-01197-RFB-BNW

**STIPULATION AND [PROPOSED] ORDER
EXTENDING RESPONSE AND REPLY
DATES RE DEFENDANT AND CROSS-
COMPLAINANT ROSS DRESS FOR LESS,
INC.’S MOTION TO AMEND THE
JUDGMENT AND FOR FURTHER RELIEF
UNDER 28 U.S.C. § 2202 AND FRCP 59(E)
[ECF NO. 163]**

STIPULATION

Plaintiff/Counter-Defendant BOCA PARK MARKETPLACE SYNDICATIONS
GROUP, LLC (“Boca Park”) and Defendant/Counter-Claimant ROSS DRESS FOR LESS, INC.
 (“Ross”) stipulate and agree as follows:

1. The deadline for Boca Park to file and serve a response to Defendant and Cross-
Complainant Ross Dress for Less, Inc.’s Motion to Amend the Judgment and for
Further Relief Under 28 U.S.C. § 2202 and FRCP 59(e) (ECF No. 163; “Motion to

Amend”) shall be extended from August 2, 2019 to August 16, 2019.

2. The deadline for Ross to file and serve a reply in support of its Motion to Amend shall be extended from August 9, 2019 to September 6, 2019.

This is the parties’ first request for an extension of these deadlines.

DATED this 25th day of July, 2019.

HEJMANOWSKI & MCCREA LLC

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/Charles H. McCrea
CHARLES H. MCCREA (SBN104)
520 South Fourth Street
Suite 320
Las Vegas, Nevada 89101
(702) 834-8777

BY: /s/John E. Bragonje
DANIEL F. POLSENBERG (SBN 2376)
JOEL D. HENRIOD (SBN 8492)
JOHN E. BRAGONJE (SBN 9519)
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, Nevada 89169
(702) 949-8200

*Attorneys for Plaintiff/Counter
Defendant BOCA PARK
MARKETPLACE SYNDICATIONS
GROUP, LLC.*

BUCHALTER, APC
GLENN P. ZWANG
Admitted Pro Hac Vice
VALERIE BANTNER PEO
Admitted Pro Hac Vice
55 Second Street, Suite 1700
San Francisco, California 94105
(415) 227-0900

*Attorneys for Defendant/Counter-
Claimant ROSS DRESS FOR LESS, INC.*

ORDER

IT IS SO ORDERED.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT COURT JUDGE

DATED this 25th day of July 2019